



COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION
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Commissioner

August 4, 2006

Matthew Hughes
Environmental Engineer
Wheelabrator Technologies, Inc.
4 Liberty Lane West
Hampton, NH 03842

Dear Mr. Hughes:

Thank you for the prompt filing of your Material Separation Plan 4 ("MSP4"). The Massachusetts Department of Environmental Protection ("MassDEP") has reviewed the MSP4 and has comments of a general nature that apply to all three municipal waste combustor operators in addition to comments specific to the Wheelabrator Plans.

General Comments:

1. As discussed at our meeting in March, MassDEP intends to actively promote MSP4 services by conducting direct outreach to schools, businesses and health care facilities in your contract communities encouraging them to avail themselves of the services offered.

Comments on Wheelabrator's Plan:

Prior to approval of the MSP4, MassDEP requests the following additional information or changes to Wheelabrator's MSP4:

1. MassDEP's priorities outlined at our meeting in March 2006 included a focus on health care facilities and business-directed mercury lamp recovery. Please explain why these priorities were not addressed in your Plan.
2. School Clean Sweeps: The draft plan indicates, "all of the School Systems in the service area have conducted" a clean out. It is our understanding that to date Wheelabrator has extended this program to public schools only. As discussed in our MSP4 planning meeting in March, we are interested in seeing this program extended to all primary and secondary schools, including private schools. In light of this expanded scope, an annual budget of \$500 is insufficient.

3. Service Area Definition: As discussed at our meeting in March, the MSP Guidance document very broadly defines Service Area. We talked about having varying service levels for different tiers of generators with Contract Communities having access to all services. Please provide a definition of other service areas that will be covered by the Plan, as resources allow.

MassDEP recognizes the new and innovative programs for thermostat and button cell recovery that Wheelabrator has included in MSP4 and looks forward to seeing the results of these well-focused initiatives. I look forward to receiving your revised MSP4 by August 25, 2006.

Sincerely,

Nancy L. Seidman, Division Director
Consumer and Transportation Programs
Bureau of Waste Prevention

cc: Frank Ferraro, Wheelabrator Technologies, Inc.
Patrick Scanlon, MSP Coordinator
James C. Colman, MassDEP
Greg Cooper, MassDEP
Brooke Nash, MassDEP
Tina Klein, MassDEP
Marilyn Levenson, MassDEP